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9 UNITED STATES OF AMERICA

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UNITED STATES OF AMERICA,
Plaintiff,
v.
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BRAYAN RAMOS-BRITO,
aka, "Brian Ramos-Brito,"
Defendant.

No. 2:25-mj-03506-DUTY

MOTION TO DISMISS COMPLAINT
WITHOUT PREJUDICE AGAINST
DEFENDANT PURSUANT TO FEDERAL RULE
OF CRIMINAL PROCEDURE 48(a)

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The United States Attorney for the Central District of
California hereby requests leave of the Court to dismiss the
complaint against defendant Brayan Ramos-Brito without prejudice.

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The government's request for dismissal is made in good faith
and in the interest of justice. The law "generally require[s] a
district court to defer to the government's decision to seek a
dismissal of a criminal charge" under Rule 48(a) motions when they
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are not opposed by the defense. United States v. Gonzalez, 58 F.3d

1 459, 462 (9th Cir. 1995).

2 Accordingly, the government requests that the Court grant this
3 motion to dismiss the complaint without prejudice against defendant
4 Brayan Ramos-Brito pursuant to Federal Rule of Criminal Procedure
5 48(a).

6 Dated: June 18, 2025

Respectfully submitted,

7 BILAL A. ESSAYLI
United States Attorney

8 CHRISTINA T. SHAY
9 Assistant United States Attorney
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10 /s/
11 JOSHUA J. LEE
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